

Rolling Knolls Landfill Superfund Site – Request for Clarification to Selected USEPA Comments to May 2018 Revised Draft Feasibility Study

	Page	Section	Paragraph	Comment	Clarification Required or Response
General Comments					
1	General			The ARSs were developed as site-specific PRGs and would replace the applicable chemical-specific ARARs. For the evaluation of chemical specific ARARs for Alternatives 3, 4, and 5, provide a detailed discussion on how the PRGs would be met and how capping/excavating 25 acres, remediation of APCs, and vegetative covers would minimize exposure pathways.	The draft FS provided a discussion on how the PRGs would be met through remediation and controls and that exposure pathways would be reduced as a result of the remedial action taken under each alternative. Accordingly, we do not believe any changes are necessary.
Specific Comments					
3	XV	ES		Why aren't the numerical values for the comparative analysis of alternatives as presented on page 81 and 108 used in the Executive Summary? The Executive Summary presents a table (pg. XV) with a range of narrative descriptors for comparison which don't seem to be replicated in the text of the document.	The tables on pages 81 and 108 present the total scores for the remedial alternatives. The executive summary provides a summary of the comparison of the alternatives to the criteria. The narrative descriptors in the Executive Summary are used throughout the text of Sections 6 and 7. We propose no change.
6	6	2.6	3	EPA has completed review of the RI and has finalized it. Please revise text accordingly.	References to the RI Report will be updated. This comment seems to mean that the most recent version of the RI Report (January 2018) has been approved. Please confirm.
8	13	2.7.5.1	1	For hydrologic conditions, add discussion of culvert connecting large pond to wooded area. Show on figure.	We don't know what culvert you're referring to. Please provide additional information.
9	30	4.2.1	2nd paragraph of the page	Soil results were compared to the NJDEP's IGWSSLs to identify areas where COCs in soil could migrate to and impact groundwater. Provide the comparison table.	This comparison was provided in the RI Report. The table requested includes all the soil data and is very long. It would make more sense to refer to the RI Report than include this table in the FS.

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11	36	5.1	2nd paragraph	The text says, "Another consideration in the identification of general response actions is that 35 acres of the landfill are located within an environmentally sensitive area within the GSNWR." However, based on Figure D4-1 of the Final BERA, the majority of the 35 acres of landfill within GSNWR was low-value upland or wetland. A very small area was identified as potential Bog Turtle Habitat Area (Figure 6-1). Please define the meaning of "environmentally sensitive area" and show these environmentally sensitive areas on a figure referenced in Section 5.	We assumed that the GSNWR was an environmentally sensitive area by virtue of its designation and a national wildlife refuge. If that is not the case, then the language can be modified or deleted.
13	48	6.2.2	Under Chemical Specific ARARs	This paragraph confused the rating of "compliance with ARARs" with whether the alternative does or does not comply with chemical specific ARARs. Alternative 2 does not comply with chemical specific ARARs since the contaminant concentrations would remain the same at ground surface. Please revise the text accordingly.	The text states that this remedial alternative (Alternative 2 – Site Controls) has poor compliance with chemical specific ARARs. Please clarify what changes EPA is requesting.
15		6.3 and 6.4		Why weren't SS-47, SS-49, SS-50, SS-51, SS-53, SS-71, SS-72 and SS-75 included in the Selected Area to be capped or excavated? All have elevated levels of contamination and are less than 200 feet from the Selected Area. Significant additional risk reduction (both eco and human health) may be achieved.	We provide the technical basis for the size of the Selected Area in Appendix B. Total PCB concentrations at all the soil locations referenced in the comment are well below the RBC. At SS-72, which is the only location with congener analysis, the non-dioxin like PCB concentration is below the RBC. And all the referenced results were included in the calculation of the residual exposure point concentrations (EPCs). Accordingly, no additional significant risk reduction would be achieved by including these locations in the Selected Area.

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19	59	6.3.5	1st paragraph	Under Protection of Community during Remedial Actions, after the sentence for 22,500 to 26,700 truck trips over two to three years, add a sentence to read "Using on site material for backfill or capping to potentially reduce truck traffic would be evaluated during the remedial design". Also, add a sentence that if the remedial construction causes any damage to public road, the road will be repaired to the satisfaction of the township.	<p>The sentence on evaluating the use of on-Site material will be added.</p> <p>The sentence: “Britten Road will be restored to its condition prior to the start of the remedial action.” will be added.</p>
22	70	6.4.6	First bullet	What are the reasons to anticipate an excavation to 4 feet under Alternative 4, but not under Alternative 3? Please include rationale for excavation of 4 feet.	<p>Alternative 4 anticipates excavating the 25-acre area. Alternative 3 includes capping that area, not excavating it. We will clarify that APCs under both scenarios will be excavated to 2 feet.</p> <p>Please confirm that this change will address the comment.</p>
23	72, 75, 77	6.5, 6.5.2, 6.5.5		No description or discussion was provided on potential impacts and/or loss of flood control capacity with this alternative. How will the impacts be mitigated? Seems like this is the determining factor for this alternative. Discussion should be provided. Also discuss how location specific ARARs for wetland would be met.	Flood storage capacity and stormwater controls are discussed in Section 6.5.6 (Ability to Construct and Operate the Technology). Further discussion of storm water controls and mitigation of storm water impacts cannot be provided until the remedy is designed. ARARs for wetlands will be met either through replication or reconstruction as discussed in Section 6.5.5 (Environmental Impacts). Again, the final decision on how the wetlands will be restored must be deferred until later when we know (1) the actual extent of wetlands to be restored; (2) the type of wetlands; and (3) the cost for on-Site mitigation compared to off-Site mitigation. Please clarify why EPA believes this is a determining factor for this alternative.
24	81	6.6		Total score should exclude ranking of cost.	Cost is one of EPA’s remedy selection criteria. Please provide a basis for removing the ranking of cost from the remedy scoring.
25	82	6.6.1	3rd paragraph	Alternative 5 provides higher risk reduction than Alternatives 3 and 4. Please revise.	The FS states “Although the areas to be remediated in Alternatives 3 and 4 are smaller than in Alternative 5, the remedial actions in Alternatives 3 and 4 . . . address the areas with the highest concentrations of COCs, so the risk reduction is similar to Alternative 5.” While Alternative 5 does result in lower HQs for some COCs, Alternatives 3 and 4 results in HQs which are protective of ecological receptors. Therefore, we propose no change to the text.
27	84, 85	6.6.5, 6.6.6		Remove the statements regarding increased risk to workers at excavations to 4 feet below ground surface from these two sections and other sections. This is a shallow excavation process and can be easily mitigated with sloping of side walls. Shoring will most likely not be needed.	The assessment is realistic because of the instability of the waste to be excavated. The Group believes that conservatism is appropriate on issues of worker safety. We propose no change.
28	87	7.2		Remove all evaluation statement from this section.	“No action” in the case of groundwater does not eliminate the natural attenuation processes. With this alternative, the concentrations of certain constituents will decrease through natural attenuation. The potential effectiveness of these processes should be discussed and evaluated at the same level of detail as the other alternatives and compared. Therefore, we propose no change.
30	102	7.4.4		Under Magnitude of Residual Risk, the text states that an impermeable cap could be placed on the source area to achieve source control since this measure would prevent infiltration of rainwater that could carry the contaminants down to the groundwater. However, there may be areas (like at the TP-09 area) where groundwater is very shallow and the source likely extends below the water table, so an impermeable cap would not stop contaminant migration. Please provide a discussion on where the wastes and contaminants are located vertically in comparison to groundwater. See specific comment 29 on Section 7.3 regarding appropriate remedies for groundwater source area(s).	The text will be revised to state that the area of TP-09 will be excavated and, if other sources are identified, either capping or excavation will be used, as appropriate. If a cap is used, it will be impermeable.

36	Tables 6-1 and 7-1		<p>In tables 6-1 (comparative analysis of soil remedial alternatives) and 7-1 (comparative analysis of groundwater remedial alternatives), all evaluation criteria are evaluated and compared with the same numerical ranking of poor, moderate, good, and excellent. Threshold criteria and balancing criteria should not have the same categorization or comparison. Please make the following changes to the tables:</p> <ul style="list-style-type: none"><li>• For threshold criteria, change the grading to either “meets NCP criterion” or “does not meet NCP criterion”. The alternatives either comply with protection of human health and environment and compliance with ARARs or do not meet them. These criteria should not be described as poor, excellent, or somewhere in-between.</li><li>• Instead of using the numerical ranking mentioned above, for all balancing criteria except cost, change grading to the following (including the descriptions in the notes):<ul style="list-style-type: none"><li>○ Poor – alternative is expected to perform poorly against criterion</li><li>○ Moderate - alternative is expected to perform moderately well against criterion</li><li>○ High – alternative is expected to perform very well against criterion</li></ul></li><li>• For cost balancing criteria, remove any grading or classification. Only keep the dollar amount value/total cost in these tables.</li><li>• Include a row for each alternative that states the approximate time it would take to achieve the RAOs</li></ul> <p>In addition to the comparative analysis tables for the soil and groundwater alternatives, please include detailed tables in the FS that describe and summarize how the respective alternatives rank against evaluation criteria from Section 6 and 7.</p>	<p>This would be a major change to the tables and text and would be difficult and time consuming to implement. We propose the following:</p> <p>We can make this revision but request USEPA input on the scoring for each criterion.</p> <p>We propose NOT to make this change. We don’t understand the basis for the change, especially since we have been using the same scoring system since the first version of the FS Report (December 2017). In addition, this revision will affect much of the text and tables, and will be very time consuming.</p> <p>Cost is one of EPA’s remedy selection criteria. Please provide a basis for removing the ranking of cost from the remedy scoring. We will include an estimate of the approximate time as requested.</p> <p>This seems to be a summary of the text. We can do it, but it will be time-consuming and may delay submission of the revised FS Report.</p>
37	Table 6-1		<p>The 4 ranking for location- and action-specific ARARs for Alternative 2 are incorrect when the text ranked these two criteria as poor. Please revise accordingly.</p>	<p>The table matches the text (see Section 6.2.2). The text states that “compliance with location specific ARARs is excellent” and “compliance with action specific ARARs is excellent” so the ranking of 4 in the table is correct. Please clarify the comment.</p>